

February 17, 2011

ALCOM Public Affairs
9480 Pease Avenue, Suite 120
JBER, AK 99506

To ALCOM Public Affairs, regarding the JPARC EIS,

The Denali Citizens Council (DCC) is a locally founded (1974), non-profit, grassroots community education and advocacy organization. We write to express concern about the proposed expansions outlined in the *JPARC Modernization and Enhancement EIS*. We support the “No Action” alternatives, and have provided our concerns below. Denali Citizens Council (DCC) works to promote the natural integrity of Denali National Park and Preserve and foster responsible planning in the greater community. These expansions will affect lands within our area of concern, including several hundred square miles of land inside the Denali Borough, and airspace throughout the Borough, and over Denali National Park and Preserve. While our concerns do not end at these boundaries, our primary area of concern includes this land. Our board has heard from a number of members, and others within our communities. There have been a number of local meetings where residents have expressed concerns about the proposed training expansions. The Denali Borough Assembly recently passed a resolution in support of the “No Action” alternatives. The Middle Nenana Fish and Game Advisory Committee recently moved to do the same. Denali Citizens Council also supports the “No Action” alternatives because of the following concerns:

1. Much of the land and airspace included in the proposed expansions is used for travel by hunters and recreational users. Expanded land and airspace use, intensified use of existing areas, live ordnances, extended nighttime training hours, and lowered flight levels in these areas would greatly change their nature, and also raises safety concerns for those using the area.
2. In the event of an aircraft crash or other accident involving spillage of potential hazardous waste, recovery and cleanup would be difficult, if not impossible. This is evidenced by the November 2010 crash of an F-22 in the existing Fox 3 MOA, which not only resulted in the death of military personnel, but also brought about a large-scale cleanup effort. DCC is concerned that the proposed expansions will magnify the risk of this happening again.
3. The areas these expansions would impact contain complex environments unique not only to the United States but to the entire world, not simply uninhabited terrain available for training. DCC is concerned about impacts to sensitive ecological factors, such as habitat quality, calving areas, rutting areas, sensitive aquatic areas, and migration routes for both mammals and birds.

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4. Many documented noise sensitive areas are located nearby and within existing and proposed MOAs. The Susitna MOA overlaps with Denali National Park and Preserve. DCC is concerned about the impacts increased Night Training could have on the soundscapes in and adjacent to these noise sensitive areas, as well as the potential noise impacts to residents and others using the area.
5. The National Park Service has established standards for amount of noise disturbance consistent with park values in all areas of Denali, and we recommend you consult with NPS regarding the impact of the training expansion on these standards.

For these reasons, the Denali Citizens Council supports “No Action” on proposals in the JPARC Modernization and Enhancement EIS.

Thank you for the opportunity to comment on this important issue, and we look forward to remaining involved throughout the decision-making process.

On behalf of the Denali Citizens Council Board,

/s/ Erica Watson

Board Member, Denali Citizens Council
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